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21 *Attorneys for Defendants Lyft, Inc., Logan*  
22 *Green, John Zimmer, Brian Roberts, Prashant*  
23 *(Sean) Aggarwal, Ben Horowitz, Valerie Jarrett,*  
24 *David Lawee, Hiroshi Mikitani, Ann Miura-Ko,*  
25 *and Mary Agnes (Maggie) Wilderotter*

26 Additional Counsel on Signature Page

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

29 In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

30 This Document Relates to:

31 ALL ACTIONS

32  
**JOINT STIPULATION AND**  
**ORDER REGARDING**  
**DEFENDANTS' FILING OF**  
**SUPPLEMENTAL DECLARATION IN**  
**SUPPORT OF DEFENDANTS'**  
**OPPOSITION TO CLASS**  
**CERTIFICATION**

1 Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer,  
 2 Brian Roberts, Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi  
 3 Mikitani, Ann Miura-Ko, and Mary Agnes (Maggie) Wilderotter (the “Defendants”) and Lead  
 4 Plaintiff Rick Keiner (the “Plaintiff,” and together with the Defendants, the “Parties”), through  
 5 their counsel, submit the following Joint Stipulation and [Proposed] Order regarding Defendants’  
 6 filing of a supplemental declaration in support of Defendants’ Opposition to Plaintiff’s Motion  
 7 for Class Certification (ECF No. 117).

8 WHEREAS, on September 25, 2020, Plaintiff filed a Motion for Class Certification (the  
 9 “Motion”) (ECF No. 98) and the supporting Declaration of Whitney E. Street (ECF 98-1);

10 WHEREAS, on January 19, 2021, Defendants filed an Opposition to the Motion (ECF  
 11 No. 117) and the supporting Declaration of Melyn C. N. Grant (ECF No. 118) with attached  
 12 declarations from investors who purchased shares in Lyft’s initial public offering (ECF No. 118-  
 13 1).

14 WHEREAS, on February 5, 2021, Plaintiff filed his Reply in support of the Motion (ECF  
 15 No. 127);

16 WHEREAS, the hearing on the Motion is scheduled for March 11, 2021;

17 WHEREAS, Defendants have gathered more declarations from investors who purchased  
 18 shares in Lyft’s initial public offering that Defendants believe will aid the Court in evaluating the  
 19 Motion and intend to submit them as an exhibit to a Supplemental Declaration of Melyn C. N.  
 20 Grant in support of Defendants’ Opposition to the Motion;

21 WHEREAS, Plaintiff does not agree that the investor declarations establish that any  
 22 investor had actual knowledge that Lyft’s initial public offering registration statement contained  
 23 untrue statements or omitted to disclose material facts and do not provide grounds for denying  
 24 the Motion, but do not oppose their submission to the Court by Defendants;

25 WHEREAS, Defendants believe that there will still be sufficient time for the Court to  
 26 consider the additional investor declarations before the hearing on the Motion, that the filing of  
 27 the Supplemental Declaration will not alter the date of any event or deadline already fixed by  
 28

1 Court order, and that any further declarations obtained before the hearing will be submitted at the  
2 earliest possible opportunity;

3 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,  
4 subject to Court approval, that Defendants may file the Supplemental Declaration of Melyn C.  
5 N. Grant in Support of Defendants' Opposition to Plaintiff's Motion for Class Certification by  
6 March 5, 2021.

7  
8 Stipulated and agreed to by:

9 Dated: March 5, 2021  
10  
11

**BLOCK & LEVITON LLP**

/s/ Jeffrey C. Block

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21 *Lead Counsel and Counsel for Plaintiff*  
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Mikitani, Ann Miura-Ko, and Mary Agnes  
(Maggie) Wilderotter*

## **FILER'S ATTESTATION**

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: March 5, 2021

/s/ *Colleen C. Smith*  
Colleen C. Smith

\* \* \*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 3/5/2021

Haywood S. Gill Jr.  
HONORABLE HAYWOOD S. GILLIAM, JR.  
United States District Judge